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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

THOMAS V. GOULD  
CLERK, U.S. DISTRICT COURT  
W.D. OF TN, MEMPHIS

Toni Owens

(Name of plaintiff or plaintiffs)

v.

CIVIL ACTION NO. \_\_\_\_\_

Amedisys Hospice

(Name of defendant or defendants)

**COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964**

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff,

Toni Owens

(name of plaintiff)

is a citizen of the United States and resides at

3256 N Johnson Circle

(street address)

Memphis

(city)

Shelby

(country)

TN

(state)

38112

(zip code)

901-650-5386

(telephone number)

3. Defendant Amedys Hospice  
(defendant's name)

lives at, or its business is located at 1355 Lynnfield Bldg. Suite 120  
(street address)

4. Plaintiff sought employment from the defendant or was employed by the defendant at

1355 Lynnfield Bldg. Suite 120

(street address)

Memphis  
(city)

Shelby  
(country)

TN  
(state)

38119  
(zip code)

5. Defendant discriminated against plaintiff in the manner indicated in paragraph 9 of this complaint on or about 15 March 2013

(day)

(month)

(year)

6. Defendant filed charges against the defendant with the Tennessee Fair Employment Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about 20 March 2013

(day)

(month)

(year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about 20 March 2013

(day)

(month)

(year)

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue, which was received by plaintiff on 14 Sept 2014. (Attach a copy of the notice to this complaint.)  
(day) (month) (year)

9. Because of plaintiff's (1) ☒ race, (2) ☒ color, (3) ☐ sex, (4) ☐ religion, (5) ☐ national origin, defendant

(a) ☐ failed to employ plaintiff.

(b) ☒ terminated plaintiff's employment.

(c) ☐ failed to promote plaintiff.

(d) \_\_\_\_\_

10. The circumstances under which defendant discriminated against plaintiff were as follows: Their are or was 3 RN Case managers at the time  
A. White and a hispanic male. the female was white.  
and we were all on the computer which was new to  
the company. when the white female RN and myself  
went to the Nursing home or a care home where there  
was more then one patient we got the computer  
signature page signed first and then we went to see  
the patients next. so the computer signature page  
might say 12pm, 12<sup>01</sup>pm, 12<sup>02</sup>pm for 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12  
when we say the patient the visit note might say  
12<sup>00</sup>pm - 1pm, 1<sup>01</sup>pm - 1<sup>30</sup>pm, 1<sup>01</sup>pm - 2pm and so on  
until all the patients was covered. the unemployment  
office granted me my unemployment once I appealed and  
gave me Reason the times did not match and I have that  
letter

11. The acts set forth in paragraph 9 of this complaint

- (a) \_\_\_\_ are still being committed by defendant.  
 (b) \_\_\_\_ are no longer being committed by defendant.  
 (c) X may still be being committed by defendant.

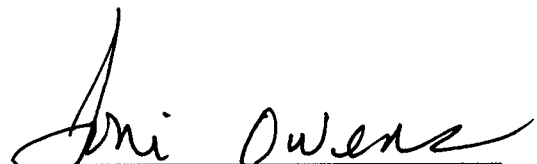
12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- (a) \_\_\_\_ Defendant be directed to employ plaintiff, or  
 (b) \_\_\_\_ Defendant be directed to re-employ plaintiff, or  
 (c) \_\_\_\_ Defendant be directed to promote plaintiff, or;  
 (d) X Defendant be directed to pay plaintiff for all  
missed work and clear my Record  
and take the termination from my files

and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury. Yes ( ) No ( )

  
 SIGNATURE OF PLAINTIFF